NPDES
Inspection Report

Southport Forest Products, LLC

(NPDES Permit # ORR223265)
(ODEQ File # 110570)

Coos Bay, Oregon

November 29, 2016

Prepared by:

Sandra Brozusky
Environmental Protection Agency, Region 10
Office of Compliance and Enforcement
Multimedia Inspection and RCRA Enforcement
Management Unit

United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N	ORR223265	161129	~	R	2

Remarks

21 | 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved	
67 69	70	71	72	73 74	75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time/Date	Permit Effective Date
Southport Forest Products, LLC 93611 Coos Sumner Lane Coos Bay, Oregon 97420	11/29/16 2:00 pm	7/1/2012
	Exit Time/Date 11/29/16 6:10 pm	Permit Expiration Date 6/30/2017

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*
Lonnie Wood, Safety and Environmental Manager 541-297-2611 lonniew@southportforest.com	SIC: 2421 ORR223265 ODEQ #110570
Name, Address of Responsible Official/Title/Phone and Fax Number Jason Smith, Owner, 541-404-1908 PO Box 298 Coos Bay, Oregon 97420	**Contacted** ☐ Yes ☑ No

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

✓ Permit	☐ Self-Monitoring Program	☐ Pretreatment	☐ MS4
✓ **Records/Reports**	☐ Compliance Schedules	☐ Pollution Prevention	
✓ Facility Site Review	☐ Laboratory	✓ Storm Water	
✓ Effluent/Receiving Waters	☐ Operations & Maintenance	☐ Combined Sewer Overflow	
☐ Flow Measurement	☐ Sludge Handling/Disposal	☐ Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes SEV Description

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Sandra Brozusky	EPA OCE 206-553-5317	5/2/16
Joseph Roberto	EPA OCE 206-553-1669	
Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date
		05/10/17

INSTRUCTIONS

Section A: National Data System Coding *(i.e., PCS)*

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. *(Use the Remarks columns to record the State permit number, if necessary.)*

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A	Performance Audit	U	IU Inspection with Pretreatment Audit	!	Pretreatment Compliance (Oversight)
B	Compliance Biomonitoring	X	Toxics Inspection	@	Follow-up (enforcement)
C	Compliance Evaluation (non-sampling)	Z	Sludge - Biosolids	{	Storm Water-Construction-Sampling
D	Diagnostic	#	Combined Sewer Overflow-Sampling	}	Storm Water-Construction-Non-Sampling
F	Pretreatment (Follow-up)	$	Combined Sewer Overflow-Non-Sampling	:	Storm Water-Non-Construction-Sampling
G	Pretreatment (Audit)	+	Sanitary Sewer Overflow-Sampling	~	Storm Water-Non-Construction-Non-Sampling
I	Industrial User (IU) Inspection	&	Sanitary Sewer Overflow-Non-Sampling	<	Storm Water-MS4-Sampling
J	Complaints	\	CAFO-Sampling	-	Storm Water-MS4-Non-Sampling
M	Multimedia	=	CAFO-Non-Sampling	>	Storm Water-MS4-Audit
N	Spill	2	IU Sampling Inspection		
O	Compliance Evaluation (Oversight)	3	IU Non-Sampling Inspection		
P	Pretreatment Compliance Inspection	4	IU Toxics Inspection		
R	Reconnaissance	5	IU Sampling Inspection with Pretreatment		
S	Compliance Sampling	6	IU Non-Sampling Inspection with Pretreatment		
		7	IU Toxics with Pretreatment		

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A — State (Contractor)
B — EPA (Contractor)
E — Corps of Engineers
J — Joint EPA/State Inspectors—EPA Lead
L — Local Health Department (State)
N — NEIC Inspectors
O — Other Inspectors, Federal/EPA (Specify in Remarks columns)
P — Other Inspectors, State (Specify in Remarks columns)
R — EPA Regional Inspector
S — State Inspector
T — Joint State/EPA Inspectors—State lead

Column 20: Facility Type. Use one of the codes below to describe the facility.

1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
2 — Industrial. Other than municipal, agricultural, and Federal facilities.
3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
4 — Federal. Facilities identified as Federal by the EPA Regional Office.
5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

Table of Contents

List of Acronyms Used in This Report

- BMP - Best Management Practice
- BOD - Biochemical Oxygen Demand
- ODEQ - Oregon Department of Environmental Quality
- NPDES - National Pollutant Discharge Elimination System
- O&G - Oil and Grease
- SWPCP - Stormwater Pollution Control Plan
- TSS - Total Suspended Solids
- DMR - Discharge Monitoring Reports
- COD - Chemical Oxygen Demand

(This inspection report documents the findings of the inspection conducted at Southport Forest Products, LLC on November 29, 2016. This inspection consisted of an **opening conference** to discuss the purpose and expectations of the inspection, a **facility tour** to inspect the stormwater impacted areas of the site, a **records review** to evaluate permit required documentation, and a **closing conference** to discuss the areas of concern identified during the inspection.

Unless otherwise noted, all details in this inspection report were obtained from conversations with Lonnie Wood or from observations during the inspection.)

I. Inspection Information

Facility Name	**Southport Forest Products, LLC** (facility; Southport Forest)
Inspection Purpose	The primary focus of this inspection was to conduct a compliance evaluation inspection to determine compliance with the Oregon Industrial Stormwater Discharge General Permit (ISGP), identified as the 1200-Z general permit and Section 402 of the Clean Water Act. **For this facility, this meant evaluating the management of stormwater at the site.**
Inspection Date	November 29, 2016
Time Arrived	2:00 PM
Time Departed	6:05 PM
Weather Condition	Dry
Facility Representatives Present	Lonnie Wood
EPA Inspection Team	Sandra Brozusky (Lead Inspector) Joe Roberto
Observed Discharge	Due to limited access, I could not verify a discharge from the facility. See the Areas of Concern section for information regarding stormwater flow entering and potentially bypassing a stormwater control measure.
Inspection Entry	• The inspection was unannounced. • EPA credentials were presented to Lonnie Wood. • I explained the purpose of the inspection to Lonnie Wood. • We were not denied access to the facility. • Lonnie Wood accompanied us throughout the inspection.
Inspection Type	Compliance evaluation inspection, without sample collection.

II. Facility Information

A. General Information

Owner and Operator	Southport Forest Products, LLC. (See Attachment C for a copy of the permit assignment letter.)
Type of Operation	Log chipping facility
Standard Industrial Classification (SIC) Code	Primary: 2421 (General Sawmills and Planing Mills), and (See Attachment C for the facility's permit renewal applications)
Physical Address	93611 Coos Summer Lane Coos Bay, OR 97420
Mailing Address	PO Box 298 Coos Bay, OR 97420
GPS Coordinates	+43.299706°/-124.203530° (Obtained from the Google Earth.)
Facility Size	24.27 acres in total
Number of Employees	18
Length of Operation	Southport Forest has owned and operated this facility since 1999, according to Mr. Wood.
Number of Outfalls	1 outfall according to the Stormwater Pollution Control Plan (See Attachment D)
Date of Last Inspection	On December 15, 2011 the Oregon Department of Environmental Quality (ODEQ) conducted a technical assistance site visit. See Attachment I for a copy of the files pertaining to this visit.
Prior Enforcement Actions	ODEQ issued a warning letter on May 24, 2012 as a result of the December 15, 2011 technical assistance site visit. See Attachment I for a copy of the files pertaining to this visit.

B. Facility Contacts

Name	Title	Phone Number	Email Address
Lonnie Wood	Safety and Environmental Manager	(541) 297-2611	lonniew@southportforest.com
Jason Smith	Principle Owner	(541) 404-1908	jason@southportforest.com

C. Permit Status

At the time of the inspection, this facility was covered by the ISGP. Specifics regarding this permit are as follows:

NPDES Permit Number	ORR223265
Oregon DEQ Number	110570
Permit Effective Date	July 1, 2012
Permit Issuance Date	September 4, 2012
Permit Expiration Date	June 30, 2017

See the permit assignment letter included as Attachment C of this report for details regarding permit issuance for this facility.

At the time of inspection, Mr. Wood indicated that the facility was previously covered by the 2007 - 2012 ISGP. I did not obtain a copy of the permit assignment letter issued for the previous (2007) version of the ISGP.

D. Receiving Water

According to information provided in the facility's Stormwater Pollution Control Plan (SWPCP), stormwater discharge from this facility ultimately flows to Isthmus Slough.

At the time of inspection, Mr. Wood provided a description of stormwater flow at the facility. Stormwater leaving the facility will discharge into a seasonal hillside drainage, flowing along the northern perimeter of the facility. Mr. Wood stated that this drainage is seasonal through the winter and spring seasons. The SWPCP identifies this hillside drainage as an intermittent unnamed stream. For purposes of this report, the terms hillside drainage and unnamed stream will be used interchangeably for the same flow of water on the north perimeter.

According to Mr. Wood, the SWPCP and observations made during the inspection, the unnamed stream flows from east to west, draining into Isthmus Slough. This stream was actively flowing at the time of inspection, traveling in the direction of Isthmus Slough. At the time of inspection, I was unable to follow the stream to the point of entry into Isthmus Slough.

See Attachment E for a copy of the SWPCP facility map, which identifies this flow as an unnamed stream. Also see Attachment A for an aerial of the facility, identifying the location of this unnamed stream.

E. Facility Description/Background

Southport Forest is a chipping facility that processes whole logs into chips. According to Mr. Wood, the facility also includes a sawmill building that houses mill equipment, however the sawmill has not operated since 2008. Southport Forest owns the entire facility which covers approximately 25 acres.

Many activities at this facility are conducted outdoors including log storage, chipping operations and chip storage, and equipment storage to name a few. The facility operates Monday – Friday from 5:00AM to 4:00 PM.

At the time of inspection, the sawmill building and adjacent outside area was leased to a separate business. According to Mr. Wood, this building has been leased out for the past 2 years. Activities in and near this building include equipment storage and vehicle repair. See the Areas of Concern section for more details regarding the sawmill building.

See Attachment A for an aerial of the facility showing the main components at this facility. See also Attachment D for the SWPCP, which provides details regarding the activities at this facility.

III. Permit Applicability and Requirements

The facility's permit assignment letter for coverage under the ISGP indicates that the primary SIC code for the activity conducted at this facility is 2421 (Sawmills and Planing Mills, General). According to Table 1 of the ISGP, facilities that fall under SIC code 2421 are eligible for permit coverage under the ISGP. See Attachment C of this report for a copy of the permit assignment letter for coverage under the ISGP.

Coverage under the ISGP means that this facility is responsible for complying with general permit requirements including the following:

- Develop and implement a SWPCP to cover stormwater related activities at the facility as established in Schedule A.6 and A.7 of the general permit.

- Conduct and document facility inspections as established in Schedule B.7 of the general permit. These inspections must be conducted monthly.

- Conduct statewide benchmark monitoring for total copper, total lead, total zinc, pH, TSS, and total O&G as required in Schedule A.9, B.1 and B.2 of the general permit.

- Conduct sector-specific benchmark monitoring for COD as required in Schedule B.1 and B.2 and Subpart A of Schedule E of the general permit.

- Conduct additional pollutant monitoring for total cadmium, total chromium, and total nickel as required in Schedule B.1.d and B.2 of the general permit.

- Conduct impaired pollutant monitoring as required in Schedule B.1 and B.2 of the general permit. Note that the permit assignment letter indicates the facility's receiving water, an unnamed stream, does not have reference concentrations for impairments pollutants.

- Prepare and submit DMRs which document the results of monitoring as established in Schedule B.8 of the general permit.

- Perform corrective actions as required in Schedule A.10, A.11, and A.12 of the general permit.

These listed permit requirements were the primary focus of the inspection. Where deficiencies were observed, I have documented them in the "Areas of Concern" section of this report.

IV. Inspection Findings

A. Facility Tour

During the facility tour we examined various areas occupied by the facility including outdoor material storage areas, chemical storage areas, the stormwater outfall, best management practices, the unnamed stream and the sample collection location.

See Attachment E of this report which consists of a SWPCP site map that shows the major components of the facility.

B. Stormwater Generation, Treatment and Discharge

As mentioned earlier in this report, the primary focus of this inspection was to evaluate the management of stormwater at the site. Stormwater generated at this facility is the result of precipitation falling within the approximately 25-acre footprint of the facility.

The facility is bordered on the west by Isthmus Slough and on the south by Coos Sumner Lane. To the east, the facility property quickly rises in elevation, creating a hillside for much of the eastern border. On the north, hillside drainage is routed along the northern perimeter, draining into Isthmus Slough from east to west. In general, the majority of this property has an impervious surface and stormwater is generally routed from east to west. The facility does not have any known stormwater drains.

According to the SWPCP, in 2011 a berm and trench system was constructed along the west and north perimeters of the facility. The berm was constructed out of wood debris and earthen materials, with a trench built adjacent to the berm. This system was constructed between the facility and Isthmus Slough, as a means to prevent stormwater from the facility from flowing into Isthmus Slough. The berm and trench were constructed such that stormwater entering this trench is expected to infiltrate along the trench path. If the amount of stormwater entering the trench is greater than the amount that can infiltrate, the excess stormwater is ultimately routed to the northwest corner of the facility.

At the time of inspection, stormwater was flowing into this trench system and appeared to pass drain through large holes/cracks in the trench in the direction of

Isthmus Slough. See photographs 4-8 in Attachment B. Also see the Areas of Concern section for more details.

According to the SWPCP and Mr. Wood, the facility has one outfall, located on the northeastern corner of the property. Stormwater discharging through this outfall will enter what the facility has identified as an intermittent unnamed stream along the north property boundary. This stream drains into Isthmus Slough. Due to an accumulation of logs stored around and on top of the outfall, Mr. Wood collects the stormwater samples for the facility in the unnamed stream, after stormwater from the facility has discharged into the unnamed stream. See the Areas of Concern section for more details.

C. Records Review

As part of the inspection, I requested that the following documents be produced for review:

- **NPDES Permit** – At the time of the inspection, facility representatives produced a copy of the previous version (expired June 30, 2012) of the general permit. Note that on December 5, 2016, Mr. Wood emailed me and stated he printed out the current NPDES permit.

- **DMRs** – At the time of the inspection, I requested to see the past three years of DMRs for the facility. Facility representatives produced the DMRs as requested.

- **DMR Supporting Documentation** – At the time of the inspection, I requested the supporting documentation for samples collected within the past three years. Sample documentation was provided as requested.

- **SWPCP** – At the time of the inspection, facility representatives produced a copy of the SWPCP with a revision date of July 16, 2012.

- **Monthly Inspection Reports** – At the time of the inspection, I asked for monthly facility inspection reports for the past three years. Mr. Wood produced the facility inspection reports as requested.

- **Training Records** – At the time of the inspection, I asked for employee training records for the past three years. Mr. wood could not produce training records for 2014 at the time of the inspection.

- **Tier 1 Corrective Action Reports** – At the time of the inspection, I requested Tier 1 corrective action reports for the past three years. Mr. Wood produced one Tier 1 corrective action report at the time of inspection for samples taken on 10/31/2012. This corrective action report was in response to a COD result of 178 mg/L.

Note that the review of the above documents was not a comprehensive review

designed to identify all deficiencies. Rather, the review of these documents was more cursory in nature.

Any records deficiencies observed are listed in the "Areas of Concern" section of this report.

D. Facility Stormwater Monitoring

The permit requires that stormwater discharges from this facility be monitored for the following parameter classifications:

- statewide benchmark parameters,
- sector specific benchmark parameters (which are SIC code dependent),
- additional pollutants, and
- impairment pollutants (for discharges into impaired waterbodies).

The specific parameters that must be monitored by the permittee and the monitoring frequency are illustrated in the table below.

Parameter Classification	Parameter	Monitoring Frequency	Permit Citation
Statewide Benchmarks	Total copper, total lead, total zinc, pH, TSS, total O&G	4 times per year	Schedules A.9 & B.1 and Table 4
Sector-Specific Benchmarks	COD	4 times per year	Schedules B.1 & E and Table 4
Additional Pollutants	Cadmium, chromium, nickel	8 times over the first 3 years of permit coverage	Schedule B.1.d and Table 4

The permittee must monitor its discharges as required above unless it receives a monitoring waiver in accordance with Schedule B.4 of the permit.

As part of the records review, I requested monitoring information for samples collected by the facility. Review of this monitoring information indicates that the facility received a monitoring waiver on November 7, 2014 for all statewide benchmarks and the sector-specific benchmark. See Attachment G for a monitoring waiver issued to the facility. Also see the Areas of Concern section of this report for more information.

V. Areas of Concern

At the time of the inspection I identified several areas of concern. These concerns are identified as follows:

A. <u>Representative Sampling</u>

Schedule B.2.b of the general permit states that "Samples must be representative of the discharge."

In addition, Section C.1 of Schedule F of the general permit specifies a NPDES general condition for representative sampling. This section of the permit states that "Sampling and measurements taken as required herein must be **representative of the volume and nature** of the monitored discharge. All samples must be taken at the monitoring points specified in this permit and must be taken, unless otherwise specified, before the effluent joins or is diluted by any other waste stream, body of water, or substance..."

The facility monitors one outfall located near the northeast corner of the facility. According to the SWPCP, this outfall routes stormwater into an intermittent unnamed stream, that runs from east to west along the northern facility perimeter. Due to an accumulation of logs stored near and on top of the outfall, Mr. Wood collects stormwater samples in the intermittent unnamed stream down gradient of where the facility discharge enters the stream. As a result, the sample collected consists of stormwater discharge from the facility and water from the stream.

Since the sample location includes stormwater runoff and water from the stream, samples are not representative of stormwater leaving the facility. In addition, the monitoring point is at a location where the facility's stormwater is diluted by the stream.

See photographs 10 - 13 of Attachment B for details regarding this sample location. Also see Attachment A for an aerial with the approximate sample location.

B. **Unmaintained Control Measure**

Schedule A.6.c of the general permit states that, "Permit registrants must implement the SWPCP and any revisions to the plan. Failure to implement any of the control measures or practices described in the SWPCP is a violation of the permit."

Schedule D.3.d defines control measure as, "...any Best Management Practice or other method used to prevent or reduce the discharge of pollutants to waters of the state."

The facility's SWPCP describes a control measure located along the boundaries of the property, used to intercept stormwater leaving the property. The "Site Controls" section, on page 3 of the SWPCP states, "A compost berm composed of wood debris and earthen material was constructed along the west and northern margins of the property in 2011. The berm is located between the facility and the slough. The berm impedes any direct flow toward Isthmus Slough. As a secondary containment, a trench was constructed between the berm and the facility to intercept surface runoff from the site..."

At the time of inspection, we walked along the facility's west perimeter to view the berm and trench control measure. At a point relatively central along the western perimeter, I saw stormwater flowing into the trench. As the water entered the trench, it traveled subsurface and did not pool or flow along the trench. The water flowed subsurface and headed in the direction of Isthmus Slough, as though the water was passing through the trench.

Due to limited access past the berm, I was unable to follow the subsurface flow of water. However, the slope of the land between the control measure and Isthmus Slough was toward Isthmus Slough. In addition, the rate at which stormwater was flowing into the trench (estimated to conservatively be 5-10 gallons per minute) was such that water would be expected to pool in the trench. This control measure did not appear to impede any flow toward Isthmus Slough, as indicated in the SWPCP. Mr. Wood did not know how long the berm and trench system was in this condition.

See photographs 1-8 in Attachment B for details of stormwater flowing into the control measure. Also see Attachment A for an aerial showing the approximate location of the subsurface flow.

On December 12, 2016, Mr. Wood emailed photographs of work completed to repair the trench. See Attachment H for a copy of this correspondence.

C. **SWPCP and Sawmill Tenant**

Schedule A.6.d of the general permit states, "The SWPCP must be kept current and updated as necessary to reflect any changes to the site. Update the SWPCP within 30 days of making the changes."

Schedule A.7.b.iii of the general permit states the SWPCP must contain certain information including, "A description of industrial activities conducted at the site and significant materials stored, used, treated or disposed of in a manner that allows exposure to stormwater."

As mentioned previously, Mr. Wood stated that the sawmill building and adjacent outside area was leased to a separate business at the time of inspection. This business's activities include equipment storage and vehicle repairs in and near the building.

At the time of inspection, Mr. Wood produced a copy of the SWPCP dated July 16, 2012. I inquired if the SWPCP included information pertaining to the leased sawmill building and associated activities. Mr. Wood stated that the SWPCP did not include this information.

Correspondence with Lynn Green, a consultant for Southport Forest, in April 2017, suggests modifications to the SWPCP are underway. See Attachment H for

a copy of this correspondence. In addition, Mr. Wood provided a copy of training records for who he claims to be the tenants of the sawmill building. This record is also included in Attachment H.

D. Tier 1 Report

Schedule A.10.a of the general permit describes if stormwater sampling results exceed any of the statewide benchmarks, sector specific benchmarks or reference concentrations for impairment pollutants, the permitee must complete different actions within 30 days of obtaining the monitoring results. Schedule A.10.a.i – iii includes the following actions:

i. Investigate the cause of the elevated pollutant levels.

ii. Review the SWPCP and the selection, design, installation and implementation of control measures to ensure compliance with the permit. If permit registrant determines that SWPCP revisions are necessary based on corrective action review, submit the revised pages of the SWPCP to DEQ or Agent, including a schedule for implementing the control measures.

iii. Summarize the following information in a Tier I report that is retained on site and submitted to DEQ or Agent upon request:

1. The results of the investigation.
2. Corrective actions taken or to be taken, including date corrective action completed or expected to be completed. Where the permit registrant determines that corrective action is not necessary, provide the basis for this determination.
3. Document whether SWPCP revisions are necessary.

At the time of inspection, I requested to see Tier 1 reports for the past three years. Mr. Wood produced a Tier 1 report created for a COD exceedance on 10/31/12. Based on my review, this Tier 1 report does not provide the results from an investigation. In addition, this Tier 1 report states that no corrective action will be taken as Southport Forest will wait to see the results of the next sampling event. See Attachment F for a copy of this Tier 1 report.

E. Secondary Containment

At the time of the inspection, I saw material storage containers without secondary containment located in the fuel and oil storage area. These containers were located under cover, on a landing, and stored various oil and lubricant liquids. See photograph 14 in Attachment B for theses containers.

It is not clear whether the NPDES permit requires secondary containment for the containers mentioned above. However, these containers were located such that a catastrophic failure of these containers could result in the contents of these containers entering the trench system.

Subsequent to the inspection, Mr. Wood emailed a photograph of the containers in the fuel and oil storage area with secondary containment. See Attachment H for this correspondence.

F. **Training Records Unavailable**

Schedule A.1.j of the permit states, "Develop and maintain an employee orientation and education program to inform personnel on the components and goals of the SWPCP…The education and training must occur within 30 calendar days of hiring an employee who works in areas where stormwater is exposed to industrial activities or conducts duties related to the implementation of the SWPCP, and annually thereafter."

At the time of inspection, I asked to review records of employee training for the past three years. Based on my review of the training reports provided at the time of inspection, I identified that employee training records for 2014 were missing. Mr. Wood stated that he conducted employee training in 2014, however he did not have records for the training.

VI. Other Observations

At the time of inspection, Mr. Wood provided a copy of Southport Forest's permit renewal application, for the next effective permit in July 2017. See Attachment C for a copy of this renewal application, dated November 7, 2016. This application states that Isthmus Slough is the facility's receiving water. However, based on the SWPCP and observations made during the inspection, the facility's outfall discharges into an unnamed creek rather than Isthmus Slough. The facility SWPCP corroborates the fact that the facility's stormwater discharges into this unnamed creek. In addition, Southport Forest's permit renewal letter for the 2012-2017 permit states that the receiving water is an unnamed stream.

Based on the 2012-2017 permit renewal letter, discharging into the unnamed stream does not require Southport Forest to sample for impairment pollutants. Isthmus Slough, however, may trigger sampling for impairment pollutants.

VII. Closing Conference

Prior to concluding the inspection, I held a closing conference with Mr. Wood on November 29, 2016. The purpose of this closing conference was to discuss the preliminary findings of the inspection. I discussed the areas of concern listed above and then I thanked him for his time and assistance with the inspection.

Report Completion Date: 5/10/17

Lead Inspector Signature:

Attachment F
Tier 1 Report

Southport Forest Products, LLC

SB 11/29/16

Obtained at time of inspection

SOUTHPORT FOREST PRODUCTS, LLC
DECEMBER 12, 2012
TIER 1 CORRECTIVE ACTION.
SAMPLING TAKEN ON 10-31-12
HAD COD AT 178 mg/L WITH A
LIMIT OF 120 mg/L.
AT THIS TIME NO CORRECTIVE
ACTION WILL BE TAKEN.
WE WILL SEE HOW THE RESULTS
LOOK ON THE SAMPLING TAKEN
11-29-12 TO SEE IF ANY ACTION
IS REQUIRED.
Lonnie Wood 12-12-2012

NOTE - SAMPLING OF 11-29-12
SHOWED COD DROPPED BY ABOUT
2/3 TO 54.5 mg/L.
Lonnie Wood 1-3-2013